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June 4, 2019

**Via ECF**

Hon. I. Leo Glasser  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 22301

*Re: USA v. Sater, 98-cr-1101*

Your Honor:

This firm represents First Look Media Works, Inc. (“First Look”), which has intervened in this case to support Johnny Dwyer’s motion to unseal certain documents. *See* Dkt. 247 (Dwyer request); Dkt. 255 (order granting First Look application to intervene). We write to inquire about the pending motion and to ask the Court to convene a conference, open and on the record, regarding the status of the multiple unsealing requests that have been filed.

On April 17, 2019, this Court held a conference at which First Look’s counsel was present, along with counsel for Defendant Felix Sater and the United States. The parties presented argument on the motion to unseal various records. *See* Dkt. 270 (Minute Entry). On May 15, 2019, the Court held an *in camera* conference regarding the same subject with counsel for Defendant and the United States; First Look was not informed of the date of the conference ahead of time, and does not know what was discussed. *See* Dkt. 273 (Minute Entry). On May 27, 2019, attorneys for Defendant Sater submitted a letter with two attachments under seal, whose contents are, again, kept secret from First Look. Dkt. 274.

Given the *in camera* proceedings and sealed filings, there is no way for First Look (or the public) to understand the status of the unsealing requests or the parties’ positions on those requests. Accordingly, we respectfully request that the Court hold an open status conference to discuss these matters, so that First Look has a full and fair opportunity not only to be heard but also to learn the positions of the other parties’ with respect to its unsealing request.

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Respectfully submitted,

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/s/

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c: All counsel (via ECF)